

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

**ERIC GUNDRUM and MICHAEL KING,
individually and on behalf of all persons
similarly situated,**

Plaintiffs,

v.

**CLEVELAND INTEGRITY SERVICES,
INC.,**

Defendant.

Civil Action No.: 3:16-cv-00369-WMC

**Collective Action Pursuant to 29 U.S.C. §
216(b)**

Jury Trial Demanded

**PLAINTIFFS' EXPEDITED MOTION FOR CONDITIONAL CERTIFICATION
AND TO FACILITATE NOTICE PURSUANT TO 29 U.S.C. § 216(b)**

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b), Plaintiffs Eric Gundrum (“Gundrum”) and Michael King (“King”) (collectively, “Plaintiff”), through their undersigned counsel, respectfully move the Court to facilitate Court-approved notice of this lawsuit to all current and former employees of Cleveland Integrity Services, Inc. (“CIS”) who held the job title of inspector or similar title (“Inspectors”) in the United States in any workweek between three years prior to the date of the Court’s Order and the present.

In support of this Motion, Plaintiffs submit the accompanying memorandum of law, declarations, and exhibits, as set forth in the accompanying Index of Exhibits. Plaintiffs’ proposed Notice of Collective Action Lawsuit is attached hereto as Exhibit A. Plaintiffs’ proposed Opt-In Consent Form is attached hereto as Exhibit B.

WHEREFORE, Plaintiffs respectfully request that the Court facilitate Court-approved notice of this lawsuit to all Inspectors. A proposed Order is attached for the Court’s convenience.

Dated: June 27, 2016

Respectfully submitted,

/s/ Sarah R. Schalman-Bergen

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon counsel for Defendant Cleveland Integrity Services, Inc. via First Class Mail and electronic mail on this 27th day of June, 2016 addressed as follows to its counsel of record:

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